

Message

From: Moritz, Vera [Moritz.Vera@epa.gov]
Sent: 2/13/2017 7:19:10 PM
To: Gallo, Patty (CONTR) [Patty.Gallo@lm.doe.gov]
CC: Cummins, Laura (CONTR) [Laura.Cummins@lm.doe.gov]; Kaiser, Linda (CONTR) [Linda.Kaiser@lm.doe.gov]; Ward, David (CONTR) [David.Ward@lm.doe.gov]; Surovchak, Scott [Scott.Surovchak@lm.doe.gov]; Smith, Patricia [Smith.Patricia@epa.gov]; Spreng - CDPHE, Carl [carl.spreng@state.co.us]; Lindsay Masters - CDPHE [lindsay.masters@state.co.us]; Griffin, Susan [Griffin.Susan@epa.gov]
Subject: RF 5 year review clarifications

Patty – Susan Griffin sent out a clarifying email this morning about chromium. As per Susan’s instruction, the overly conservative assumption that all chromium is Cr6+ should be removed. Absent other, national Agency guidance on this matter, we will follow Susan’s directions. Since IRIS tox factors for chromium have not changed since the Comprehensive Risk Assessment, it will not need to be addressed.

As to the other COPCs: the more thorough analysis that Laura has already done provides support and basis to state that the UU/UE determinations are still valid even though some of the tox factors changed, as well as showing that no new contaminants need attention. We suggest placing an abridged screening and analysis in an Appendix but not necessarily all the lengthy calculations themselves.

For the text section of Section B, we suggest following Susan’s streamlined approach to focus the review on the risk drivers and place a statement to this effect: “For Ous 2 and 3, the UU/UE determination is still valid – see Appendix XX.”

In this manner, (1) the text section of Section B is streamlined, (2) the Appendix will provide support for the statement that UU/UE is still appropriate today for Ous 2-3, and (3) that no new contaminants need further evaluation. Since IRIS tox factors for chromium have not changed since the Comprehensive Risk Assessment, it does not need to be addressed.

We suggest a similar approach to the rad contaminants (ie, Question B text only addressing Pu and indicating validity of UU/UE, with ref to more analysis in the Appendix). As always, let us know if you’d like to discuss further -- Vera

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From: Gallo, Patty (CONTR) [mailto:Patty.Gallo@lm.doe.gov]
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To: Moritz, Vera <Moritz.Vera@epa.gov>
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Subject: Follow up on risk emails for RF FYR report

Vera,

As you know, Laura Cummins and Susan Griffin spoke yesterday about the scope of the chemical risk review for the RF FYR report. As Susan stated in her email to you, she suggested Laura focus the review on the risk drivers (i.e., the COCs identified in the 2006 CRA). These COCs are arsenic, benzo(a)pyrene, dioxin, vanadium, and plutonium. Because Laura

has already completed a more comprehensive chemical risk review that included all chemical constituents for which PRGs were developed in the CRA, if we follow Susan's direction, we would simply reduce the narrative in Question B and only discuss the toxicity changes for these few COCs. As a result, any discussion of Cr+6 or other constituents whose toxicity factors changed over this FYR period would be deleted from the Question B discussion. We would retain the information on the more comprehensive evaluation in the internal project files. Because the working group has had discussions on Cr+6 changes, we just want to confirm that the evaluation you and Pat Smith are expecting addresses COCs only.

Because the radionuclide risk review is just beginning, however, we would like clarification on whether our radiological risk assessor should review all radionuclides discussed in the CRA (i.e., uranium isotopes, Pu-239/240, and Am-241) or just Pu-239/240 (the COC from the CRA).

Many thanks for your help.



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